Jeffrey Ratliff rgilbertson@qwestoffice.com RANSOM GILBERTSON MARTIN & RATLIFF, LLP 1500 NE Irving Street, Suite 412 Portland, Oregon 97232 Tel: 503-226-3664 Liaison Counsel for Plaintiffs

Leigh Handelman Smollar lsmollar@pomlaw.com Patrick V. Dahlstrom pdahlstrom@pomlaw.com POMERANTZ LLP 10 S. LaSalle St. Ste. 3505 Chicago, IL 60603 Tel: 212-661-1100

Laurence M. Rosen, Esq. lrosen@rosenlegal.com
Philip Kim, Esq.
pkim@rosenlegal.com
THE ROSEN LAW FIRM, P.A.
275 Madison Avenue, 34th Floor
New York, NY 10016
Tel: 212-686-1060

Co-Lead Counsel for Lead Plaintiffs

UNITED STATES DISTRICT COURT DISTRICT OF OREGON

IN RE GALENA BIOPHARMA, INC. SECURITIES LITIGATION,

CASE No.:3:14-cv-00367-SI

STIPULATION AND [PROPOSED] ORDER FOR BRIEFING SCHEDULE OF DEFENDANTS LIDINGO HOLDINGS, LLC AND MILLA BJORLIN ANSWER TO THE COMPLAINT WHEREAS, on October 31, 2014, Lead Plaintiffs Kisok Cho, Anthony Kim, Pantelis

Lavidas and Joseph Buscema ("Lead Plaintiffs") and Plaintiff Alan Theriault (collectively, the

"Plaintiffs") filed their Consolidated Class Action Complaint for Violations of the Federal

Securities Laws (the "Complaint") (Dkt. No. 59), naming as Defendants, among others Lidingo

Holdings, LLC and Kamilla Bjorlin.

WHEREAS, on May 12, 2015, Defendants Lidingo Holdings, LLC, and Kamilla Bjorlin filed

their motion to dismiss (Dkts. No. 138);

WHEREAS, on August 5, 2015 the Court issued its Opinion and Order (Dkt. No. 149)

granting in part and denying in part the Defendants' motions to dismiss; and

WHEREAS, the Court's August 5, 2015 Opinion and Order granted Plaintiffs leave to

file an amended complaint within 28 days from the date of the Opinion and Order;

NOW THEREFORE, it is agreed, subject to the approval of the Court, that:

1. Plaintiffs will not file an amended complaint;

2. Defendants Lidingo Holdings, LLC and Kamilla Bjorlin shall file and serve their

Answer to the complaint on or before 30 days from signing of this stipulation.

SO STIPULATED:

Dated: September 29, 2015

/s/ Laurence M. Rosen

Laurence M. Rosen

lrosen@rosenlegal.com

Philip Kim, Esq.

pkim@rosenlegal.com

THE ROSEN LAW FIRM, P.A.

275 Madison Avenue, 34th Floor

New York, NY 10016

Tel: 212-686-1060

Co-Lead Counsel for Lead Plaintiffs

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Leigh Handelman Smollar
Patrick V. Dahlstrom
pdahlstrom@pomlaw.comLeigh
Handelman Smollar
lsmollar@pomlaw.com
POMERANTZ LLP
10 S. LaSalle St. Ste. 3505
Chicago, IL 60603
Tel: 212-661-1100
Co-Lead Counsel for Lead Plaintiffs

-and-

Jeffrey Ratliff
rgilbertson@qwestoffice.com
RANSOM GILBERTSON MARTIN
& RATLIFF, LLP
1500 NE Irving Street, Suite 412
Portland, Oregon 97232
Tel: 503-226-3664
Liaison Counsel for Plaintiffs

Dated: September 29, 2015 /s/Edward Gartenberg
Edward Gartenberg

egartenberg@gghslaw.com

GARTENBERG GELFAND HAYTON LLP 801 S. Figueroa St., Suite 2170 Los Angeles, CA 90017 (213) 542-2100

IT IS SO ORDERED:

Dated: September _____, 2015

The Hon. Michael H. Simon United States District Judge